

TAB B

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

IN RE:

W. R. GRACE & CO., et al.

Debtors.

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)
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)
)

Chapter 11

**Case No. 01-01139 9JKF)
(Jointly Administered)**

**Hearing Date: April 9, 2007
Related Docket No.: 9315**

RULE 1006 SUMMARY OF VOLUMINOUS WRITINGS

The content of the following voluminous documents is summarized in the foregoing

Motion and Memorandum:

<u>DOCUMENT</u>	<u>PAGES</u>
Motion for Leave to File Complaint, <i>Alabama, et al. v. W. R. Grace & Co., et al.</i> , No__ Original, United States Supreme Court (1989)	Pps. 1-2
Brief in Support of Motion for Leave to File Complaint, <i>Alabama, et al. v. W. R. Grace & Co., et al.</i> , No__ Original, United States Supreme Court (1989)	Knowledge and Allegation of Identical Injury by California Pps. 10, 11, 12, 21, 31, 32
State of California Claims - Admission of Previous Lawsuits for Identical Alleged Injury	9838-008, 9839-008, 9840-008, 9841-008, 9842-008, 9843-008, 9844-0008, 9845-008, 9846-008, 9847-008, 9848-008, 9849-008, 9850-008, 9851-008, 9852-0008, 9853-008, 9854-008, 9855-008, 9856-008, 9857-008, 9858-008, 9859-008, 9860-008, 9862-008, 9863-008, 9864-008, 9865-008, 9866-008,

	<p>9867-008, 9868-008, 9869-008, 9870-008, 9871-008, 9872-008, 9873-008, 9874-008, 9875-008, 9876-008, 9877-0008, 9878-008, 9879-008, 9880-008, 9881-008, 9882-008, 9883-008, 9884-008, 9885-008, 9886-008, 9887-008, 9888-008, 9889-008, 9890-008, 9891-008, 9892-008, 9893-008, 9895-008, 9896-008, 9897-008, 9909-008, 9910-008, 9925-008, 9928-008, 9970-008, 9988-008, 9993-008, 10018-008, 10019-008, 10020-008, 10053-008, 10058-008, 10078-008, 10160- 008, 10208-008, 10230-008, 10237-008, 10303-008, 10319-008, 10597-008, 10621- 008, 11735-008, 11745-008, 11800-008, 11802-008, 11817-008, 11819-008, 11866- 008, 11876-008, 11918-008, 11957-008, 11962-008, 12616-008.</p>
San Diego State Johns-Manville Claim	<p>Knowledge and Allegation of Identical Injury by San Diego State</p> <p>Pps. 1-11</p>
CSU Johns-Manville Claim	<p>Knowledge and Allegation of Identical Injury by California State University</p> <p>Pps. 1-10</p>
County of Sonoma Johns-Manville Claim	<p>Knowledge and Allegation of Identical Injury</p>

	by County of Sonoma Pps. 1-4
Report on the Facilities Asbestos Inspection and Risk Assessment Services for The California State University System (the "1985 Report")	Executive Summary, Program Objectives and Procedures Pps. E1-E2, 6-7
University of California Claim against Johns-Manville, Corp.	Knowledge and Allegation of Identical Injury by the University of California Pps. 1-7
Supreme Court Order, <i>Alabama, et al. v. W. R. Grace & Co., et al.</i> , (1990)	Order Denying Petition P. 1

The foregoing pages of the above documents, along with a copy of this Rule 1006 Summary, are contained in Debtors' Appendix of Rule 1006 Statements With Attached Information.

Dated: February 16, 2007


Lawrence E. Flatley

No. ORIGINAL

In The

Supreme Court of the United States

October Term, 1989

ALABAMA, ARIZONA, ARKANSAS, CALIFORNIA, CONNECTICUT, DELAWARE, FLORIDA, ILLINOIS, INDIANA, IOWA, LOUISIANA, MAINE, MISSOURI, MONTANA, NEBRASKA, NEW HAMPSHIRE, NEW YORK, NORTH CAROLINA, NORTH DAKOTA, OHIO, OKLAHOMA, RHODE ISLAND, SOUTH DAKOTA, TENNESSEE, TEXAS, UTAH, VERMONT, WASHINGTON, and WYOMING,

Plaintiffs,

-against-

W.R. GRACE & COMPANY, NATIONAL GYPSUM COMPANY, UNITED STATES GYPSUM COMPANY, USG CORPORATION, AMERICAN BILTRITE, INC., ARMSTRONG WORLD INDUSTRIES, INC., AZROCK INDUSTRIES, INC., BASIC INCORPORATED, CAREY-CANADA, INC., THE CELOTEX CORPORATION, CERTAINTEED CORPORATION, CROWN CORK & SEAL COMPANY, INC., EAGLE-PICHER INDUSTRIES, INC., FIBREBOARD CORPORATION, THE FLINTKOTE COMPANY, GAF CORPORATION, GEORGIA-PACIFIC CORPORATION, H.K. PORTER COMPANY, INC., KEENE CORPORATION, KENTILE FLOORS, INC., OWENS-CORNING FIBERGLAS CORPORATION, OWENS-ILLINOIS, INC., PFIZER, INC., RAYMARK INDUSTRIES, INC., SPRAYED INSULATION, INC., and TURNER & NEWALL PLC,

Defendants.

MOTION FOR LEAVE TO FILE COMPLAINT

The states of Alabama, Arizona, Arkansas, California, Connecticut, Delaware, Florida, Illinois, Indiana, Iowa, Louisiana, Maine, Missouri, Montana, Nebraska, New Hampshire, New York, North Carolina, North Dakota,

Ohio, Oklahoma, Rhode Island, South Dakota, Tennessee, Texas, Utah, Vermont, Washington, and Wyoming, by their respective Attorneys General, hereby move this Court for leave to file the attached Complaint, pursuant to Article III, Section 2 of the United States Constitution and Section 1251, Paragraph (b)(3) of Title 28 of the United States Code for the reasons more fully set out in the attached Brief.

Respectfully submitted,

KENNETH O. EIKENBERRY
Attorney General of Washington

JOHN ELLIS*
Deputy Attorney General
State of Washington
710 Second Avenue, #1300
Seattle, Washington 98104
(206) 464-7786

*COUNSEL OF RECORD FOR
PLAINTIFFS

January 29, 1990

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No. ORIGINAL

In The

Supreme Court of the United States

October Term, 1989

ALABAMA, ARIZONA, ARKANSAS, CALIFORNIA, CON-
NECTICUT, DELAWARE, FLORIDA, ILLINOIS, INDIANA,
IOWA, LOUISIANA, MAINE, MISSOURI, MONTANA,
NEBRASKA, NEW HAMPSHIRE, NEW YORK, NORTH CAR-
OLINA, NORTH DAKOTA, OHIO, OKLAHOMA, RHODE
ISLAND, SOUTH DAKOTA, TENNESSEE, TEXAS, UTAH,
VERMONT, WASHINGTON, and WYOMING,

Plaintiffs,

-against-

W.R. GRACE & COMPANY, NATIONAL GYPSUM COMPANY,
UNITED STATES GYPSUM COMPANY, USG CORPORATION,
AMERICAN BILTRITE, INC., ARMSTRONG WORLD INDUS-
TRIES, INC., AZROCK INDUSTRIES, INC., BASIC INCORPO-
RATED, CAREY-CANADA, INC., THE CELOTEX
CORPORATION, CERTAINTEED CORPORATION, CROWN
CORK & SEAL COMPANY, INC., EAGLE-PICHER INDUS-
TRIES, INC., FIBREBOARD CORPORATION, THE
FLINTKOTE COMPANY, GAF CORPORATION, GEORGIA-
PACIFIC CORPORATION, H.K. PORTER COMPANY, INC.,
KEENE CORPORATION, KENTILE FLOORS, INC., OWENS-
CORNING FIBERGLAS CORPORATION, OWENS-ILLINOIS
INC., PFIZER, INC., RAYMARK INDUSTRIES, INC., SPRAYED
INSULATION, INC., and TURNER & NEWALL PLC,

Defendants

BRIEF IN SUPPORT OF
MOTION FOR LEAVE TO FILE COMPLAINT

JURISDICTION

The States invoke the original jurisdiction of the
Court pursuant to Article III, Section 2 of the United

States Constitution and Section 1251, Paragraph (b)(3) of Title 28 of the United States Code.

**CONSTITUTIONAL PROVISION AND
STATUTE INVOLVED**

Article III, Section 2 of the United States Constitution.

The judicial Power shall extend to all Cases, in Law and Equity, . . . between a State and Citizens of another State . . . and between a State . . . and foreign States, Citizens or Subjects

In all Cases affecting Ambassadors, other public Ministers and Consuls, and those in which a State shall be Party, the supreme Court shall have original Jurisdiction.

Section 1251, Paragraph (b)(3) of Title 28 of the United States Code.

The Supreme Court shall have original but not exclusive jurisdiction of . . . [a]ll actions or proceedings by a State against the citizens of another State or against aliens.

STATEMENT OF THE CASE

The States bring this action in their capacity as *parens patriae* to protect the public health and as owners of public buildings contaminated by asbestos-containing products. The States seek equitable relief designed to reimburse them for the costs incurred in abating the asbestos contamination present in state-owned buildings.

and facilities. In their Complaint, the States claim that the named Asbestos Companies knew, or should have known, of the link between exposure to asbestos fibers and disease at the time of the manufacture, distribution, and marketing of their asbestos-containing products to the States. The States also allege that the Asbestos Companies failed to warn the States of the health hazards associated with asbestos exposure and thereby breached their duty to provide safe products to the public. Further, as alleged, the Asbestos Companies have failed to abate the health hazards created by the presence of their products, and the States are now required to act at great expense to remedy the asbestos contamination found in public buildings. The States seek restitution for the costs of asbestos abatement activities from the Asbestos Companies pursuant to the Public Assistance Doctrine, articulated in the *Restatement of Restitution* § 115 (1937).


SUMMARY OF ARGUMENT

This Court has original jurisdiction of the States' action pursuant to Article III, Section 2 of the United States Constitution and Section 1251, Paragraph (b)(3) of Title 28 of the United States Code as an action brought by a state against citizens of another state. This suit brought by the States warrants the exercise of the Court's original jurisdiction as it raises issues of serious magnitude and because no other adequate forum exists where all of the Asbestos Companies may be sued and their resources equitably apportioned after a finding of liability. Additionally, this Court should exercise jurisdiction whether there is minimal or complete diversity of citizenship

Georgia v. Pennsylvania Railroad Co., 324 U.S. at 450-451. The economic well-being of a state may also affect its ability to borrow funds. The ability and power of a state to borrow funds is important to all 50 states. *South Carolina v. Regan*, 465 U.S. 367, 382 (1984).

The States submit that the "seriousness and dignity" of their claim require the attention of this Court. *Illinois v. Milwaukee*, 406 U.S. 91, 93 (1972). The States acknowledge that the sheer number of states petitioning this Court may not, in and of itself, warrant assumption of jurisdiction. See *Washington v. General Motors Corp.*, 406 U.S. 109 (1972). But see *South Carolina v. Regan*, 465 U.S. at 382 (court granted leave to file original claim by South Carolina, joined by twenty-four states as amici curiae, alleging injury to states' borrowing power which was of "vital importance to all fifty States"). The case at bar, however, presents additional matters implicating the unique concerns of federalism. See, e.g., *Maryland v. Louisiana*, 451 U.S. at 743, 744. The States seek to avoid interstate competition for the limited resources of the Asbestos Companies and the natural resultant disharmony that can flow therefrom. This Court was established by the framers of the Constitution to avoid just such consequences. *Georgia v. Pennsylvania Railroad Co.*, 324 U.S. at 450.

The States seek to protect their people and property from further serious harm, to enhance the public weal, and to preserve their economic vitality. Through the exercise of its original jurisdiction, this Court should address the serious injury caused to the States by the manufacturers, distributors, and marketers of asbestos-containing products.



That same argument was rejected in *In Re State and Regents Buildings Asbestos Cases*, Nos. 99081 and 99082, slip op. at 4 (Minn. Dist. Ct. Dakota County July 23, 1986) (order denying dismissal) (App. 48), wherein the court observed that since no safe level of asbestos exposure had yet been defined, "[e]ach day of exposure to asbestos puts the plaintiff in a position involving 'an immediate necessity for action.' " *Id.*, quoting *Restatement of Restitution* section 115 comment a; accord *Federal Reserve Bank of Minneapolis v. Carey-Canada, Inc.*, No. Civ. 3-86-185, slip op. (D. Minn. Aug. 31, 1988) (order denying summary judgment) (App. 63). And in *West Virginia v. Auer Sprayed Insulations*, No. 86-C-458, slip op. at 3 (Cir. Ct. W.Va. Monongalia County Sept. 4, 1987) (order denying dismissal) (App. 75), the court ruled that a restitution claim under section 115 was recognized in West Virginia and was "particularly suitable to an asbestos property damage case."

The cases that have denied a viable cause of action under section 115 have narrowly interpreted the duty element in that section to require a duty "in the first instance" to remove asbestos, independent of duties that may be imposed under tort or contract law. *Board of Education of City of Chicago v. A, C and S, Inc.*, 131 Ill.2d 428, 465-466 (1989); *Town of Hookset School District v. W.R. Grace and Co.*, 617 F. Supp. 126, 134 (D.N.H. 1984). This narrow interpretation, however, is not universally accepted.

Another opinion interpreting the duty in section 115 provided:

Third, Gypsum asserts that Hebron has failed to allege facts that would impose on Gypsum the duty to have removed the asbestos. A necessary element of section 115 is an independent duty to act by the defendant party, which the plaintiff party fulfills upon the inaction of the defendant party. This duty need not be absolute, and need not be of a type or degree that would otherwise give rise to legal liability. *United States v. Consolidated Edison Co. of N.Y.*, 580 F.2d 1122, 1127 (2d Cir. 1978). Section 115's duty element is a "flexible concept," that can be met by the "manifest" responsibilities of a party in a given "factual context" as well as by common law or statutory mandates. *Id.*

Hebron Public School District No. 13 v. U.S. Gypsum, 690 F. Supp. 866, 869 (D.N.D. 1988), *appeal docketed*, No. 89-5565 ND (8th Cir. Nov. 8, 1989).

The States contend that the Asbestos Companies owe to them the duty to abate the hazards caused by the presence of their asbestos-containing products in public facilities. The predicate for this duty arises from the Asbestos Companies' breach of their duty to test their products prior to distribution and marketing and breach of their duty to warn of the hazards associated with asbestos exposures. See W.P. Keeton, D. Dobbs, R. Keeton, D. Owen, *Prosser and Keeton on the Law of Torts* § 92 (5th ed. 1984).

Additionally, the States submit that there is another applicable duty that has not been addressed by the above decisions. A party has a duty to exercise reasonable care to prevent injury to another when the party has created a condition, whether by tortious or innocent act, and subsequently the party realizes that the condition so caused

PART 4: ASBESTOS LITIGATION AND CLAIMS**A. INTRODUCTION**

1. Has any asbestos-related property damage lawsuit or claim been filed against Grace on behalf of this claiming party relating to the property for which you are making this claim?
- ☐ No
- ☒ Yes - lawsuit
- ☐ Yes - non-lawsuit claim (other than a workers' compensation claim)

2. Has any asbestos-related property damage lawsuit or claim been filed against any other party on behalf of this claiming party relating to the property for which you are making this claim?
- ☐ No
- ☒ Yes - lawsuit
- ☐ Yes - non-lawsuit claim (other than a workers' compensation claim)

If an asbestos-related property damage lawsuit has been filed by or on behalf of this claiming party relating to the property for which you are making a claim, complete Section B. below.

If an asbestos-related property damage non-lawsuit claim has been made by or on behalf of this claiming party relating to the property for which you are making a claim, complete Section C. on the following page.

B. LAWSUITS

1. Please provide the following information about each asbestos-related property damage lawsuit which has been filed relating to the property for which you are making this claim or attach a copy of the face page of each complaint filed.

a. Caption: ALABAMA v. W.R. GRACE, ET AL

b. Court where suit originally filed: US SUPREME CT Docket No.: 116

c. Date filed: 01 - 29 - 1990

Month Day Year

a. Caption:

b. Court where suit originally filed: County/State Docket No.:

c. Date filed: - - -

Month Day Year

a. Caption:

b. Court where suit originally filed: County/State Docket No.:

c. Date filed: - - -

Month Day Year

(Attach additional pages if necessary.)

9276109

SERIAL #

009838-000008

PART 4: ASBESTOS LITIGATION AND CLAIMS**A. INTRODUCTION**

1. Has any asbestos-related property damage lawsuit or claim been filed against Grace on behalf of this claiming party relating to the property for which you are making this claim?

☐ No
☒ Yes – lawsuit
☐ Yes – non-lawsuit claim (other than a workers' compensation claim)

2. Has any asbestos-related property damage lawsuit or claim been filed against any other party on behalf of this claiming party relating to the property for which you are making this claim?

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Month Day Year

a. Caption

b. Court where suit originally filed: Docket No.:
County/State

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Month Day Year

(Attach additional pages if necessary.)

9276109

SERIAL #

009839-000008

PART 4: ASBESTOS LITIGATION AND CLAIMS**A. INTRODUCTION**

1. Has any asbestos-related property damage lawsuit or claim been filed against Grace on behalf of this claiming party relating to the property for which you are making this claim?

☐ No
☒ Yes – lawsuit
☐ Yes – non-lawsuit claim (other than a workers' compensation claim)

2. Has any asbestos-related property damage lawsuit or claim been filed against any other party on behalf of this claiming party relating to the property for which you are making this claim?

☐ No
☒ Yes – lawsuit
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If an asbestos-related property damage lawsuit has been filed by or on behalf of this claiming party relating to the property for which you are making a claim, complete Section B. below.

If an asbestos-related property damage non-lawsuit claim has been made by or on behalf of this claiming party relating to the property for which you are making a claim, complete Section C. on the following page.

B. LAWSUITS

1. Please provide the following information about each asbestos-related property damage lawsuit which has been filed relating to the property for which you are making this claim or attach a copy of the face page of each complaint filed.

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County/State

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- - -

Month Day Year

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9276109

SERIAL #

009840-000008

PART 4: ASBESTOS LITIGATION AND CLAIMS**A. INTRODUCTION**

1. Has any asbestos-related property damage lawsuit or claim been filed against Grace on behalf of this claiming party relating to the property for which you are making this claim?

☐ No
☒ Yes – lawsuit
☐ Yes – non-lawsuit claim (other than a workers' compensation claim)

2. Has any asbestos-related property damage lawsuit or claim been filed against any other party on behalf of this claiming party relating to the property for which you are making this claim?

☐ No
☒ Yes – lawsuit
☐ Yes – non-lawsuit claim (other than a workers' compensation claim)

If an asbestos-related property damage lawsuit has been filed by or on behalf of this claiming party relating to the property for which you are making a claim, complete Section B. below.

If an asbestos-related property damage non-lawsuit claim has been made by or on behalf of this claiming party relating to the property for which you are making a claim, complete Section C. on the following page.

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a. Caption

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Month Day Year

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9276109

SERIAL #J

009841-000008

PART 4: ASBESTOS LITIGATION AND CLAIMS**A. INTRODUCTION**

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- ☐ No
- ☒ Yes – lawsuit
- ☐ Yes – non-lawsuit claim (other than a workers' compensation claim)

2. Has any asbestos-related property damage lawsuit or claim been filed against any other party on behalf of this claiming party relating to the property for which you are making this claim?
- ☐ No
- ☒ Yes – lawsuit
- ☐ Yes – non-lawsuit claim (other than a workers' compensation claim)

If an asbestos-related property damage lawsuit has been filed by or on behalf of this claiming party relating to the property for which you are making a claim, complete Section B. below.

If an asbestos-related property damage non-lawsuit claim has been made by or on behalf of this claiming party relating to the property for which you are making a claim, complete Section C. on the following page.

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(Attach additional pages if necessary.)

9276109

SERIAL #

009842-000008

PART 4: ASBESTOS LITIGATION AND CLAIMS**A. INTRODUCTION**

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2. Has any asbestos-related property damage lawsuit or claim been filed against any other party on behalf of this claiming party relating to the property for which you are making this claim?

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County/State

Docket No.:

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(Attach additional pages if necessary.)

9276109

SERIAL #

009843-000010

PART 4: ASBESTOS LITIGATION AND CLAIMS**A. INTRODUCTION**

1. Has any asbestos-related property damage lawsuit or claim been filed against Grace on behalf of this claiming party relating to the property for which you are making this claim?
- ☐ No
- ☒ Yes - lawsuit
- ☐ Yes - non-lawsuit claim (other than a workers' compensation claim)

2. Has any asbestos-related property damage lawsuit or claim been filed against any other party on behalf of this claiming party relating to the property for which you are making this claim?
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Month Day Year
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County/State
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Month Day Year

(Attach additional pages if necessary.)

9276109

SERIAL #

009844-000008

PART 4: ASBESTOS LITIGATION AND CLAIMS**A. INTRODUCTION**

1. Has any asbestos-related property damage lawsuit or claim been filed against Grace on behalf of this claiming party relating to the property for which you are making this claim?
- ☐ No
- ☒ Yes – lawsuit
- ☐ Yes – non-lawsuit claim (other than a workers' compensation claim)

2. Has any asbestos-related property damage lawsuit or claim been filed against any other party on behalf of this claiming party relating to the property for which you are making this claim?
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(Attach additional pages if necessary.)

9276109

SERIAL #

009845-000008

PART 4: ASBESTOS LITIGATION AND CLAIMS**A. INTRODUCTION**

1. Has any asbestos-related property damage lawsuit or claim been filed against Grace on behalf of this claiming party relating to the property for which you are making this claim?
- ☐ No
- ☒ Yes – lawsuit
- ☐ Yes – non-lawsuit claim (other than a workers' compensation claim)

2. Has any asbestos-related property damage lawsuit or claim been filed against any other party on behalf of this claiming party relating to the property for which you are making this claim?
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If an asbestos-related property damage non-lawsuit claim has been made by or on behalf of this claiming party relating to the property for which you are making a claim, complete Section C, on the following page.

B. LAWSUITS

1. Please provide the following information about each asbestos-related property damage lawsuit which has been filed relating to the property for which you are making this claim or attach a copy of the face page of each complaint filed.

- a. Caption: Alabama, et al. v. W.R. Grace, et al.
- b. Court where suit originally filed: US SUPREME CT Docket No.: 116
County/State
- c. Date filed: 01 - 29 - 1990
Month Day Year
-
- a. Caption: _____
- b. Court where suit originally filed: _____ Docket No.: _____
County/State
- c. Date filed: ____ - ____ - ____
Month Day Year
-
- a. Caption: _____
- b. Court where suit originally filed: _____ Docket No.: _____
County/State
- c. Date filed: ____ - ____ - ____
Month Day Year

(Attach additional pages if necessary.)

9276109

SERIAL #

009846-000008

PART 4: ASBESTOS LITIGATION AND CLAIMS**A. INTRODUCTION**

1. Has any asbestos-related property damage lawsuit or claim been filed against Grace on behalf of this claiming party relating to the property for which you are making this claim?

- ☐ No
☒ Yes – lawsuit
☐ Yes – non-lawsuit claim (other than a workers' compensation claim)

2. Has any asbestos-related property damage lawsuit or claim been filed against any other party on behalf of this claiming party relating to the property for which you are making this claim?

- ☐ No
☒ Yes – lawsuit
☐ Yes – non-lawsuit claim (other than a workers' compensation claim)

If an asbestos-related property damage lawsuit has been filed by or on behalf of this claiming party relating to the property for which you are making a claim, complete Section B. below.

If an asbestos-related property damage non-lawsuit claim has been made by or on behalf of this claiming party relating to the property for which you are making a claim, complete Section C. on the following page.

B. LAWSUITS

1. Please provide the following information about each asbestos-related property damage lawsuit which has been filed relating to the property for which you are making this claim or attach a copy of the face page of each complaint filed.

- a. Caption Alabama, et al. v. W.R. Grace, et al.
- b. Court where suit originally filed: US SUPREME CT Docket No.: 116
County/State
- c. Date filed: 01 - 29 - 1990
Month Day Year
-
- a. Caption
- b. Court where suit originally filed: Docket No.:
County/State
- c. Date filed: - -
Month Day Year
-
- a. Caption
- b. Court where suit originally filed: Docket No.:
County/State
- c. Date filed: - -
Month Day Year

(Attach additional pages if necessary.)

9276109

SERIAL #

009847-000008

PART 4: ASBESTOS LITIGATION AND CLAIMS**A. INTRODUCTION**

1. Has any asbestos-related property damage lawsuit or claim been filed against Grace on behalf of this claiming party relating to the property for which you are making this claim?

- ☐ No
☒ Yes – lawsuit
☐ Yes – non-lawsuit claim (other than a workers' compensation claim)

2. Has any asbestos-related property damage lawsuit or claim been filed against any other party on behalf of this claiming party relating to the property for which you are making this claim?

- ☐ No
☒ Yes – lawsuit
☐ Yes – non-lawsuit claim (other than a workers' compensation claim)

If an asbestos-related property damage lawsuit has been filed by or on behalf of this claiming party relating to the property for which you are making a claim, complete Section B. below.

If an asbestos-related property damage non-lawsuit claim has been made by or on behalf of this claiming party relating to the property for which you are making a claim, complete Section C. on the following page.

B. LAWSUITS

1. Please provide the following information about each asbestos-related property damage lawsuit which has been filed relating to the property for which you are making this claim or attach a copy of the face page of each complaint filed.

a. Caption Alabama, et al. v. W.R. Grace, et al.

b. Court where suit originally filed: US SUPREME CT Docket No.: 116
County/State

c. Date filed: 01 - 29 - 1990
Month Day Year

a. Caption _____

b. Court where suit originally filed: _____ Docket No.: _____
County/State

c. Date filed: ____ - ____ - ____
Month Day Year

a. Caption _____

b. Court where suit originally filed: _____ Docket No.: _____
County/State

c. Date filed: ____ - ____ - ____
Month Day Year

(Attach additional pages if necessary.)

9276109

SERIAL #J

PART 4: ASBESTOS LITIGATION AND CLAIMS**A. INTRODUCTION**

1. Has any asbestos-related property damage lawsuit or claim been filed against Grace on behalf of this claiming party relating to the property for which you are making this claim?
- ☐ No
- ☒ Yes -- lawsuit
- ☐ Yes -- non-lawsuit claim (other than a workers' compensation claim)

2. Has any asbestos-related property damage lawsuit or claim been filed against any other party on behalf of this claiming party relating to the property for which you are making this claim?
- ☐ No
- ☒ Yes -- lawsuit
- ☐ Yes -- non-lawsuit claim (other than a workers' compensation claim)

If an asbestos-related property damage lawsuit has been filed by or on behalf of this claiming party relating to the property for which you are making a claim, complete Section B. below.

If an asbestos-related property damage non-lawsuit claim has been made by or on behalf of this claiming party relating to the property for which you are making a claim, complete Section C. on the following page.

B. LAWSUITS

1. Please provide the following information about each asbestos-related property damage lawsuit which has been filed relating to the property for which you are making this claim or attach a copy of the face page of each complaint filed.

- a. Caption Alabama, et al. v. W.R. Grace, et al.
- b. Court where suit originally filed: US SUPREME CT Docket No.: 116
County/State
- c. Date filed: 01 - 29 - 1990
Month Day Year
-
- a. Caption _____
- b. Court where suit originally filed: _____ Docket No.: _____
County/State
- c. Date filed: ____ - ____ - ____
Month Day Year
-
- a. Caption _____
- b. Court where suit originally filed: _____ Docket No.: _____
County/State
- c. Date filed: ____ - ____ - ____
Month Day Year

(Attach additional pages if necessary.)

9276109

SERIAL #

009849-000008

PART 4: ASBESTOS LITIGATION AND CLAIMS**A. INTRODUCTION**

1. Has any asbestos-related property damage lawsuit or claim been filed against Grace on behalf of this claiming party relating to the property for which you are making this claim?

- ☐ No
☒ Yes -- lawsuit
☐ Yes -- non-lawsuit claim (other than a workers' compensation claim)

2. Has any asbestos-related property damage lawsuit or claim been filed against any other party on behalf of this claiming party relating to the property for which you are making this claim?

- ☐ No
☒ Yes -- lawsuit
☐ Yes -- non-lawsuit claim (other than a workers' compensation claim)

If an asbestos-related property damage lawsuit has been filed by or on behalf of this claiming party relating to the property for which you are making a claim, complete Section B. below.

If an asbestos-related property damage non-lawsuit claim has been made by or on behalf of this claiming party relating to the property for which you are making a claim, complete Section C. on the following page.

B. LAWSUITS

1. Please provide the following information about each asbestos-related property damage lawsuit which has been filed relating to the property for which you are making this claim or attach a copy of the face page of each complaint filed.

- a. Caption Alabama, et al. v. W.R. Grace, et al.
- b. Court where suit originally filed: US SUPREME CT Docket No.: 116
County/State
- c. Date filed: 01 - 29 - 1990
Month Day Year
-
- a. Caption
- b. Court where suit originally filed: Docket No.:
County/State
- c. Date filed: - -
Month Day Year
-
- a. Caption
- b. Court where suit originally filed: Docket No.:
County/State
- c. Date filed: - -
Month Day Year

(Attach additional pages if necessary.)

9276109

SERIAL #

009850-000008

PART 4: ASBESTOS LITIGATION AND CLAIMS**A. INTRODUCTION**

1. Has any asbestos-related property damage lawsuit or claim been filed against Grace on behalf of this claiming party relating to the property for which you are making this claim?

- ☐ No
☒ Yes - lawsuit
☐ Yes - non-lawsuit claim (other than a workers' compensation claim)

2. Has any asbestos-related property damage lawsuit or claim been filed against any other party on behalf of this claiming party relating to the property for which you are making this claim?

- ☐ No
☒ Yes - lawsuit
☐ Yes - non-lawsuit claim (other than a workers' compensation claim)

If an asbestos-related property damage lawsuit has been filed by or on behalf of this claiming party relating to the property for which you are making a claim, complete Section B. below.

If an asbestos-related property damage non-lawsuit claim has been made by or on behalf of this claiming party relating to the property for which you are making a claim, complete Section C. on the following page.

B. LAWSUITS

1. Please provide the following information about each asbestos-related property damage lawsuit which has been filed relating to the property for which you are making this claim or attach a copy of the face page of each complaint filed.

- a. Caption Alabama, et al. v. W.R. Grace, et al.
- b. Court where suit originally filed: US SUPREME CT Docket No.: 116
County/State
- c. Date filed: 01 - 29 - 1990
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- a. Caption
- b. Court where suit originally filed: Docket No.:
County/State
- c. Date filed: - -
Month Day Year
-
- a. Caption
- b. Court where suit originally filed: Docket No.:
County/State
- c. Date filed: - -
Month Day Year

(Attach additional pages if necessary.)

9276109

SERIAL #J

009851-000008

PART 4: ASBESTOS LITIGATION AND CLAIMS**A. INTRODUCTION**

1. Has any asbestos-related property damage lawsuit or claim been filed against Grace on behalf of this claiming party relating to the property for which you are making this claim?

☐ No
☒ Yes - lawsuit
☐ Yes - non-lawsuit claim (other than a workers' compensation claim)

2. Has any asbestos-related property damage lawsuit or claim been filed against any other party on behalf of this claiming party relating to the property for which you are making this claim?

☐ No
☒ Yes - lawsuit
☐ Yes - non-lawsuit claim (other than a workers' compensation claim)

If an asbestos-related property damage lawsuit has been filed by or on behalf of this claiming party relating to the property for which you are making a claim, complete Section B. below.

If an asbestos-related property damage non-lawsuit claim has been made by or on behalf of this claiming party relating to the property for which you are making a claim, complete Section C. on the following page.

B. LAWSUITS

1. Please provide the following information about each asbestos-related property damage lawsuit which has been filed relating to the property for which you are making this claim or attach a copy of the face page of each complaint filed.

a. Caption Alabama, et al. v. W.R. Grace, et al.

b. Court where suit originally filed: US SUPREME CT Docket No.: 116
County/State

c. Date filed: 01 - 29 - 1990
Month Day Year

a. Caption

b. Court where suit originally filed: Docket No.:
County/State

c. Date filed: - -
Month Day Year

a. Caption

b. Court where suit originally filed: Docket No.:
County/State

c. Date filed: - -
Month Day Year

(Attach additional pages if necessary.)

9276109

SERIAL #J

009852-000008

PART 4: ASBESTOS LITIGATION AND CLAIMS**A. INTRODUCTION**

1. Has any asbestos-related property damage lawsuit or claim been filed against Grace on behalf of this claiming party relating to the property for which you are making this claim?

☐ No
☒ Yes – lawsuit
☐ Yes – non-lawsuit claim (other than a workers' compensation claim)

2. Has any asbestos-related property damage lawsuit or claim been filed against any other party on behalf of this claiming party relating to the property for which you are making this claim?

☐ No
☒ Yes – lawsuit
☐ Yes – non-lawsuit claim (other than a workers' compensation claim)

If an asbestos-related property damage lawsuit has been filed by or on behalf of this claiming party relating to the property for which you are making a claim, complete Section B. below.

If an asbestos-related property damage non-lawsuit claim has been made by or on behalf of this claiming party relating to the property for which you are making a claim, complete Section C. on the following page.

B. LAWSUITS

1. Please provide the following information about each asbestos-related property damage lawsuit which has been filed relating to the property for which you are making this claim or attach a copy of the face page of each complaint filed.

a. Caption Alabama, et al. v. W.R. Grace, et al.

b. Court where suit originally filed: US SUPREME CT Docket No.: 116
County/State

c. Date filed: 01 - 29 - 1990
Month Day Year

a. Caption

b. Court where suit originally filed: Docket No.:
County/State

c. Date filed: - -
Month Day Year

a. Caption

b. Court where suit originally filed: Docket No.:
County/State

c. Date filed: - -
Month Day Year

(Attach additional pages if necessary.)

9276109

SERIAL #

009853-000008

PART 4: ASBESTOS LITIGATION AND CLAIMS**A. INTRODUCTION**

1. Has any asbestos-related property damage lawsuit or claim been filed against Grace on behalf of this claiming party relating to the property for which you are making this claim?
- ☐ No
- ☒ Yes - lawsuit
- ☐ Yes - non-lawsuit claim (other than a workers' compensation claim)

2. Has any asbestos-related property damage lawsuit or claim been filed against any other party on behalf of this claiming party relating to the property for which you are making this claim?
- ☐ No
- ☒ Yes - lawsuit
- ☐ Yes - non-lawsuit claim (other than a workers' compensation claim)

If an asbestos-related property damage lawsuit has been filed by or on behalf of this claiming party relating to the property for which you are making a claim, complete Section B. below.

If an asbestos-related property damage non-lawsuit claim has been made by or on behalf of this claiming party relating to the property for which you are making a claim, complete Section C. on the following page.

B. LAWSUITS

1. Please provide the following information about each asbestos-related property damage lawsuit which has been filed relating to the property for which you are making this claim or attach a copy of the face page of each complaint filed.

a. Caption

Alabama, et al. v. W.R. Grace, et al.

b. Court where suit originally filed:

US SUPREME CT

Docket No.:

116

County/State

c. Date filed:

01 - 29 - 1990

Month Day Year

a. Caption

b. Court where suit originally filed:

Docket No.:

County/State

c. Date filed:

Month Day Year

a. Caption

b. Court where suit originally filed:

Docket No.:

County/State

c. Date filed:

Month Day Year

(Attach additional pages if necessary.)

9276109

SERIAL #

009854-000008

PART 4: ASBESTOS LITIGATION AND CLAIMS**A. INTRODUCTION**

1. Has any asbestos-related property damage lawsuit or claim been filed against Grace on behalf of this claiming party relating to the property for which you are making this claim?

☐ No
☒ Yes – lawsuit
☐ Yes – non-lawsuit claim (other than a workers' compensation claim)

2. Has any asbestos-related property damage lawsuit or claim been filed against any other party on behalf of this claiming party relating to the property for which you are making this claim?

☐ No
☒ Yes – lawsuit
☐ Yes – non-lawsuit claim (other than a workers' compensation claim)

If an asbestos-related property damage lawsuit has been filed by or on behalf of this claiming party relating to the property for which you are making a claim, complete Section B. below.

If an asbestos-related property damage non-lawsuit claim has been made by or on behalf of this claiming party relating to the property for which you are making a claim, complete Section C. on the following page.

B. LAWSUITS

1. Please provide the following information about each asbestos-related property damage lawsuit which has been filed relating to the property for which you are making this claim or attach a copy of the face page of each complaint filed.

a. Caption Alabama, et al. v. W.R. Grace, et al.

b. Court where suit originally filed: US SUPREME CT Docket No.: 116
County/State

c. Date filed: 01 - 29 - 1990
Month Day Year

a. Caption

b. Court where suit originally filed: Docket No.:
County/State

c. Date filed: - -
Month Day Year

a. Caption

b. Court where suit originally filed: Docket No.:
County/State

c. Date filed: - -
Month Day Year

(Attach additional pages if necessary.)

9276109

SERIAL #

009855-000008

009856-000008

PART 4: ASBESTOS LITIGATION AND CLAIMS**A. INTRODUCTION**

1. Has any asbestos-related property damage lawsuit or claim been filed against Grace on behalf of this claiming party relating to the property for which you are making this claim?

- ☐ No
☒ Yes – lawsuit
☐ Yes – non-lawsuit claim (other than a workers' compensation claim)

2. Has any asbestos-related property damage lawsuit or claim been filed against any other party on behalf of this claiming party relating to the property for which you are making this claim?

- ☐ No
☒ Yes – lawsuit
☐ Yes – non-lawsuit claim (other than a workers' compensation claim)

If an asbestos-related property damage lawsuit has been filed by or on behalf of this claiming party relating to the property for which you are making a claim, complete Section B. below.

If an asbestos-related property damage non-lawsuit claim has been made by or on behalf of this claiming party relating to the property for which you are making a claim, complete Section C. on the following page.

B. LAWSUITS

1. Please provide the following information about each asbestos-related property damage lawsuit which has been filed relating to the property for which you are making this claim or attach a copy of the face page of each complaint filed.

- a. Caption Alabama, et al. v. W.R. Grace, et al.
- b. Court where suit originally filed: US SUPREME CT Docket No.: 116
County/State
- c. Date filed: 01 - 29 - 1990
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- a. Caption
- b. Court where suit originally filed: Docket No.:
County/State
- c. Date filed: - -
Month Day Year
-
- a. Caption
- b. Court where suit originally filed: Docket No.:
County/State
- c. Date filed: - -
Month Day Year

(Attach additional pages if necessary.)

9276109

SERIAL #

009857-000008

PART 4: ASBESTOS LITIGATION AND CLAIMS**A. INTRODUCTION**

1. Has any asbestos-related property damage lawsuit or claim been filed against Grace on behalf of this claiming party relating to the property for which you are making this claim?
- ☐ No
- ☒ Yes -- lawsuit
- ☐ Yes -- non-lawsuit claim (other than a workers' compensation claim)

2. Has any asbestos-related property damage lawsuit or claim been filed against any other party on behalf of this claiming party relating to the property for which you are making this claim?
- ☐ No
- ☒ Yes -- lawsuit
- ☐ Yes -- non-lawsuit claim (other than a workers' compensation claim)

If an asbestos-related property damage lawsuit has been filed by or on behalf of this claiming party relating to the property for which you are making a claim, complete Section B, below.

If an asbestos-related property damage non-lawsuit claim has been made by or on behalf of this claiming party relating to the property for which you are making a claim, complete Section C, on the following page.

B. LAWSUITS

1. Please provide the following information about each asbestos-related property damage lawsuit which has been filed relating to the property for which you are making this claim or attach a copy of the face page of each complaint filed.

- a. Caption Alabama, et al. v. W.R. Grace, et al.
- b. Court where suit originally filed: US SUPREME CT Docket No.: 116
County/State
- c. Date filed: 01 - 29 - 1990
Month Day Year
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- a. Caption _____
- b. Court where suit originally filed: _____ Docket No.: _____
County/State
- c. Date filed: ____ - ____ - ____
Month Day Year
-
- a. Caption _____
- b. Court where suit originally filed: _____ Docket No.: _____
County/State
- c. Date filed: ____ - ____ - ____
Month Day Year

(Attach additional pages if necessary.)

9276109

SERIAL #

009858-000008

PART 4: ASBESTOS LITIGATION AND CLAIMS**A. INTRODUCTION**

1. Has any asbestos-related property damage lawsuit or claim been filed against Grace on behalf of this claiming party relating to the property for which you are making this claim?

☐ No
☒ Yes – lawsuit
☐ Yes – non-lawsuit claim (other than a workers' compensation claim)

2. Has any asbestos-related property damage lawsuit or claim been filed against any other party on behalf of this claiming party relating to the property for which you are making this claim?

☐ No
☒ Yes – lawsuit
☐ Yes – non-lawsuit claim (other than a workers' compensation claim)

If an asbestos-related property damage lawsuit has been filed by or on behalf of this claiming party relating to the property for which you are making a claim, complete Section B. below.

If an asbestos-related property damage non-lawsuit claim has been made by or on behalf of this claiming party relating to the property for which you are making a claim, complete Section C. on the following page.

B. LAWSUITS

1. Please provide the following information about each asbestos-related property damage lawsuit which has been filed relating to the property for which you are making this claim or attach a copy of the face page of each complaint filed.

a. Caption: Alabama, et al. v. W.R. Grace, et al.

b. Court where suit originally filed: US SUPREME CT Docket No.: 116
County/State

c. Date filed: 01 - 29 - 1990
Month Day Year

a. Caption: _____

b. Court where suit originally filed: _____ Docket No.: _____
County/State

c. Date filed: ____ - ____ - ____
Month Day Year

a. Caption: _____

b. Court where suit originally filed: _____ Docket No.: _____
County/State

c. Date filed: ____ - ____ - ____
Month Day Year

(Attach additional pages if necessary.)

9276109

SERIAL #

009859-000009

PART 4: ASBESTOS LITIGATION AND CLAIMS**A. INTRODUCTION**

1. Has any asbestos-related property damage lawsuit or claim been filed against Grace on behalf of this claiming party relating to the property for which you are making this claim?
- ☐ No
- ☒ Yes - lawsuit
- ☐ Yes - non-lawsuit claim (other than a workers' compensation claim)

2. Has any asbestos-related property damage lawsuit or claim been filed against any other party on behalf of this claiming party relating to the property for which you are making this claim?
- ☐ No
- ☒ Yes - lawsuit
- ☐ Yes - non-lawsuit claim (other than a workers' compensation claim)

If an asbestos-related property damage lawsuit has been filed by or on behalf of this claiming party relating to the property for which you are making a claim, complete Section B. below.

If an asbestos-related property damage non-lawsuit claim has been made by or on behalf of this claiming party relating to the property for which you are making a claim, complete Section C. on the following page.

B. LAWSUITS

1. Please provide the following information about each asbestos-related property damage lawsuit which has been filed relating to the property for which you are making this claim or attach a copy of the face page of each complaint filed.

a. Caption Alabama, et al. v. W.R. Grace, et al.

b. Court where suit originally filed: US SUPREME CT Docket No.: 116
County/State

c. Date filed: 01 - 29 - 1990
Month Day Year

a. Caption _____

b. Court where suit originally filed: _____ Docket No.: _____
County/State

c. Date filed: ____ - ____ - ____
Month Day Year

a. Caption _____

b. Court where suit originally filed: _____ Docket No.: _____
County/State

c. Date filed: ____ - ____ - ____
Month Day Year

(Attach additional pages if necessary.)

9276109

SERIAL #

009860-000008

PART 4: ASBESTOS LITIGATION AND CLAIMS**A. INTRODUCTION**

1. Has any asbestos-related property damage lawsuit or claim been filed against Grace on behalf of this claiming party relating to the property for which you are making this claim?
- ☐ No
- ☒ Yes - lawsuit
- ☐ Yes - non-lawsuit claim (other than a workers' compensation claim)

2. Has any asbestos-related property damage lawsuit or claim been filed against any other party on behalf of this claiming party relating to the property for which you are making this claim?
- ☐ No
- ☒ Yes - lawsuit
- ☐ Yes - non-lawsuit claim (other than a workers' compensation claim)

If an asbestos-related property damage lawsuit has been filed by or on behalf of this claiming party relating to the property for which you are making a claim, complete Section B. below.

If an asbestos-related property damage non-lawsuit claim has been made by or on behalf of this claiming party relating to the property for which you are making a claim, complete Section C. on the following page.

B. LAWSUITS

1. Please provide the following information about each asbestos-related property damage lawsuit which has been filed relating to the property for which you are making this claim or attach a copy of the face page of each complaint filed.

- a. Caption Alabama, et al. v. W.R. Grace, et al.
- b. Court where suit originally filed: US SUPREME CT Docket No.: 116
County/State
- c. Date filed: 01 - 29 - 1990
Month Day Year
-
- a. Caption _____
- b. Court where suit originally filed: _____ Docket No.: _____
County/State
- c. Date filed: ____ - ____ - ____
Month Day Year
-
- a. Caption _____
- b. Court where suit originally filed: _____ Docket No.: _____
County/State
- c. Date filed: ____ - ____ - ____
Month Day Year

(Attach additional pages if necessary.)

9276109

SERIAL #

009862-000008

PART 4: ASBESTOS LITIGATION AND CLAIMS**A. INTRODUCTION**

1. Has any asbestos-related property damage lawsuit or claim been filed against Grace on behalf of this claiming party relating to the property for which you are making this claim?

☐ No
☒ Yes - lawsuit
☐ Yes - non-lawsuit claim (other than a workers' compensation claim)

2. Has any asbestos-related property damage lawsuit or claim been filed against any other party on behalf of this claiming party relating to the property for which you are making this claim?

☐ No
☒ Yes - lawsuit
☐ Yes - non-lawsuit claim (other than a workers' compensation claim)

If an asbestos-related property damage lawsuit has been filed by or on behalf of this claiming party relating to the property for which you are making a claim, complete Section B. below.

If an asbestos-related property damage non-lawsuit claim has been made by or on behalf of this claiming party relating to the property for which you are making a claim, complete Section C. on the following page.

B. LAWSUITS

1. Please provide the following information about each asbestos-related property damage lawsuit which has been filed relating to the property for which you are making this claim or attach a copy of the face page of each complaint filed.

a. Caption Alabama, et al. v. W.R. Grace, et al.

b. Court where suit originally filed: US SUPREME CT Docket No.: 116
County/State

c. Date filed: 01 - 29 - 1990
Month Day Year

a. Caption

b. Court where suit originally filed: Docket No.:
County/State

c. Date filed: - -
Month Day Year

a. Caption

b. Court where suit originally filed: Docket No.:
County/State

c. Date filed: - -
Month Day Year

(Attach additional pages if necessary.)

9276109

SERIAL #

009863-000008

PART 4: ASBESTOS LITIGATION AND CLAIMS**A. INTRODUCTION**

1. Has any asbestos-related property damage lawsuit or claim been filed against Grace on behalf of this claiming party relating to the property for which you are making this claim?
- ☐ No
- ☒ Yes - lawsuit
- ☐ Yes - non-lawsuit claim (other than a workers' compensation claim)

2. Has any asbestos-related property damage lawsuit or claim been filed against any other party on behalf of this claiming party relating to the property for which you are making this claim?
- ☐ No
- ☒ Yes - lawsuit
- ☐ Yes - non-lawsuit claim (other than a workers' compensation claim)

If an asbestos-related property damage lawsuit has been filed by or on behalf of this claiming party relating to the property for which you are making a claim, complete Section B. below.

If an asbestos-related property damage non-lawsuit claim has been made by or on behalf of this claiming party relating to the property for which you are making a claim, complete Section C. on the following page.

B. LAWSUITS

1. Please provide the following information about each asbestos-related property damage lawsuit which has been filed relating to the property for which you are making this claim or attach a copy of the face page of each complaint filed.

a. Caption: Alabama, et al. v. W.R. Grace, et al.

b. Court where suit originally filed: US SUPREME CT Docket No.: 116

County/State

c. Date filed: 01 - 29 - 1990

Month Day Year

a. Caption: _____

b. Court where suit originally filed: _____ Docket No.: _____

County/State

c. Date filed: ____ - ____ - ____

Month Day Year

a. Caption: _____

b. Court where suit originally filed: _____ Docket No.: _____

County/State

c. Date filed: ____ - ____ - ____

Month Day Year

(Attach additional pages if necessary.)

9276109

SERIAL #J

009864-000008

PART 4: ASBESTOS LITIGATION AND CLAIMS**A. INTRODUCTION**

1. Has any asbestos-related property damage lawsuit or claim been filed against Grace on behalf of this claiming party relating to the property for which you are making this claim?

☐ No

☒ Yes – lawsuit

☐ Yes – non-lawsuit claim (other than a workers' compensation claim)

2. Has any asbestos-related property damage lawsuit or claim been filed against any other party on behalf of this claiming party relating to the property for which you are making this claim?

☐ No

☒ Yes – lawsuit

☐ Yes – non-lawsuit claim (other than a workers' compensation claim)

If an asbestos-related property damage lawsuit has been filed by or on behalf of this claiming party relating to the property for which you are making a claim, complete Section B. below.

If an asbestos-related property damage non-lawsuit claim has been made by or on behalf of this claiming party relating to the property for which you are making a claim, complete Section C. on the following page.

B. LAWSUITS

1. Please provide the following information about each asbestos-related property damage lawsuit which has been filed relating to the property for which you are making this claim or attach a copy of the face page of each complaint filed.

a. Caption Alabama, et al. v. W.R. Grace, et al.

b. Court where suit originally filed: US SUPREME CT Docket No.: 116
County/State

c. Date filed: 01 - 29 - 1990
Month Day Year

a. Caption _____

b. Court where suit originally filed: _____ Docket No.: _____
County/State

c. Date filed: ____ - ____ - ____
Month Day Year

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Month Day Year

(Attach additional pages if necessary.)

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SERIAL #

PART 4: ASBESTOS LITIGATION AND CLAIMS**A. INTRODUCTION**

1. Has any asbestos-related property damage lawsuit or claim been filed against Grace on behalf of this claiming party relating to the property for which you are making this claim?

☐ No
☒ Yes – lawsuit
☐ Yes – non-lawsuit claim (other than a workers' compensation claim)

2. Has any asbestos-related property damage lawsuit or claim been filed against any other party on behalf of this claiming party relating to the property for which you are making this claim?

☐ No
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a. Caption

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Month Day Year

(Attach additional pages if necessary.)

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SERIAL #J

PART 4: ASBESTOS LITIGATION AND CLAIMS**A. INTRODUCTION**

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Month Day Year

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Month Day Year

(Attach additional pages if necessary.)

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SERIAL #

PART 4: ASBESTOS LITIGATION AND CLAIMS**A. INTRODUCTION**

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Month Day Year

a. Caption

b. Court where suit originally filed: Docket No.:
County/State

c. Date filed: - -
Month Day Year

(Attach additional pages if necessary.)

9276109

SERIAL #

009868-000008

PART 4: ASBESTOS LITIGATION AND CLAIMS**A. INTRODUCTION**

1. Has any asbestos-related property damage lawsuit or claim been filed against Grace on behalf of this claiming party relating to the property for which you are making this claim?

- ☐ No
☒ Yes - lawsuit
☐ Yes - non-lawsuit claim (other than a workers' compensation claim)

2. Has any asbestos-related property damage lawsuit or claim been filed against any other party on behalf of this claiming party relating to the property for which you are making this claim?

- ☐ No
☒ Yes - lawsuit
☐ Yes - non-lawsuit claim (other than a workers' compensation claim)

If an asbestos-related property damage lawsuit has been filed by or on behalf of this claiming party relating to the property for which you are making a claim, complete Section B. below.

If an asbestos-related property damage non-lawsuit claim has been made by or on behalf of this claiming party relating to the property for which you are making a claim, complete Section C. on the following page.

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County/State
- c. Date filed: - -
Month Day Year
-
- a. Caption
- b. Court where suit originally filed: Docket No.:
County/State
- c. Date filed: - -
Month Day Year

(Attach additional pages if necessary.)

9276109

SERIAL #

009869-000008

PART 4: ASBESTOS LITIGATION AND CLAIMS**A. INTRODUCTION**

1. Has any asbestos-related property damage lawsuit or claim been filed against Grace on behalf of this claiming party relating to the property for which you are making this claim?

☐ No
☒ Yes – lawsuit
☐ Yes – non-lawsuit claim (other than a workers' compensation claim)

2. Has any asbestos-related property damage lawsuit or claim been filed against any other party on behalf of this claiming party relating to the property for which you are making this claim?

☐ No
☒ Yes – lawsuit
☐ Yes – non-lawsuit claim (other than a workers' compensation claim)

If an asbestos-related property damage lawsuit has been filed by or on behalf of this claiming party relating to the property for which you are making a claim, complete Section B. below.

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Month Day Year

a. Caption

b. Court where suit originally filed: Docket No.:
County/State

c. Date filed: - -
Month Day Year

(Attach additional pages if necessary.)

9276109

SERIAL #

009870-000008

PART 4: ASBESTOS LITIGATION AND CLAIMS**A. INTRODUCTION**

1. Has any asbestos-related property damage lawsuit or claim been filed against Grace on behalf of this claiming party relating to the property for which you are making this claim?

☐ No
☒ Yes – lawsuit
☐ Yes – non-lawsuit claim (other than a workers' compensation claim)

2. Has any asbestos-related property damage lawsuit or claim been filed against any other party on behalf of this claiming party relating to the property for which you are making this claim?

☐ No
☒ Yes – lawsuit
☐ Yes – non-lawsuit claim (other than a workers' compensation claim)

If an asbestos-related property damage lawsuit has been filed by or on behalf of this claiming party relating to the property for which you are making a claim, complete Section B. below.

If an asbestos-related property damage non-lawsuit claim has been made by or on behalf of this claiming party relating to the property for which you are making a claim, complete Section C. on the following page.

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Month Day Year

a. Caption

b. Court where suit originally filed: Docket No.:
County/State

c. Date filed: - -
Month Day Year

(Attach additional pages if necessary.)

9276109

SERIAL #

009871-000008

PART 4: ASBESTOS LITIGATION AND CLAIMS**A. INTRODUCTION**

1. Has any asbestos-related property damage lawsuit or claim been filed against Grace on behalf of this claiming party relating to the property for which you are making this claim?
- ☐ No
- ☒ Yes - lawsuit
- ☐ Yes - non-lawsuit claim (other than a workers' compensation claim)

2. Has any asbestos-related property damage lawsuit or claim been filed against any other party on behalf of this claiming party relating to the property for which you are making this claim?

☐ No

☒ Yes - lawsuit

☐ Yes - non-lawsuit claim (other than a workers' compensation claim)

If an asbestos-related property damage lawsuit has been filed by or on behalf of this claiming party relating to the property for which you are making a claim, complete Section B. below.

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County/State

c. Date filed: - -
Month Day Year

(Attach additional pages if necessary.)

9276109

SERIAL #

009872-000008

PART 4: ASBESTOS LITIGATION AND CLAIMS**A. INTRODUCTION**

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SERIAL #

009874-000008